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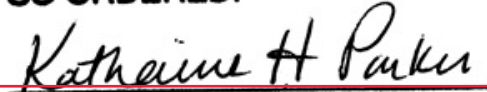
May 21, 2024

BY ECF and Email

Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Request Granted. Conditions of Supervision
Modified to eliminate service requirement.**

SO ORDERED:



**HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE**

**Re: United States v. Luca Trippitelli
22 Cr. 707 (KHP)**

05/21/2024

Dear Judge Parker:

I write on behalf of my client, Luca Trippitelli, pursuant to the attached Memorandum from Mr. Trippitelli's Probation Officer, Charles Moore, see exhibit A, to request that the Court suspend the special condition that Mr. Trippitelli perform 75 hours of community service "at an organization dedicated to assisting victims of domestic violence." See Sentencing Transcript at 39:2-4, ECF No. 44.

As Officer Moore's Memorandum explains, both Mr. Trippitelli and Officer Moore contacted several organizations that serve victims of domestic violence in an effort to locate and obtain community service opportunities. Unfortunately, those efforts were unsuccessful and the offers to volunteer were declined, due, in large part, to the fact that Mr. Trippitelli has a prior criminal conviction, albeit a non-violent misdemeanor. Furthermore, it appears that volunteer opportunities were not available. As a result, it is not

The Honorable Katharine H. Parker
United States v. Luca Trippitelli
22 Cr. 707 (KHP)

May 21, 2024

possible for Mr. Trippitelli to satisfy the special condition imposed by the Court.

Mr. Trippitelli began his term of supervised release on September 5, 2023, after serving 60 days in prison. Despite the Court's recommendation that Mr. Trippitelli serve the 60 days at a minimum-security "camp" that is adjacent to Petersburg Federal Correctional Complex in the Eastern District of Virginia, Mr. Trippitelli was designated to FCI Allenwood Low in Allenwood, Pennsylvania, located approximately 330 miles from his home. He was never transferred to a "camp" and, in fact, spent most of the 60 days in segregation and on lockdown in the segregated housing unit as a new inmate due to the lack of beds in the regular housing units.

Since his release, Mr. Trippitelli has been in full compliance with the conditions of supervision. He has not engaged in illegal conduct or run afoul of the law in any way. He is employed fulltime and is faithfully making monthly payments toward restitution as required. In fact, Mr. Trippitelli has paid toward restitution every month since his release on supervision even when, initially, he was unemployed. In addition, he continues to provide non-medical support to the husband of his dear friend, accompanying him to weekly dialysis appointments and assisting him with daily needs at home. This is a volunteer service.

Mr. Trippitelli's term of supervision is scheduled to expire on September 5, 2024. As stated, despite good intentions and substantial efforts, Mr. Trippitelli is not actually able to comply with the special condition of community service as ordered. Given this fact and Mr. Trippitelli's otherwise stellar compliance with the condition of supervised release, I join in Officer Moore's request that the Court suspend the

The Honorable Katharine H. Parker
United States v. Luca Trippitelli
22 Cr. 707 (KHP)

May 21, 2024

community service special condition. I submit that the Court's sentence has sufficiently accomplished both its punitive and rehabilitative purposes.

Respectfully submitted,

/s/ Amy Gallicchio

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Cc: AUSA Matthew Shahabian
USPO Charles Moore
USPO Hillel Greene
USPO Tandis Farrence

EXHIBIT A

UNITED STATES GOVERNMENT

MEMORANDUM

DATE: April 4, 2024

FROM: Charles E. Moore 
Senior United States Probation Officer

SUBJECT: **TRIPPITELLI, Luca**
Docket Number: 1:22CR00707-001
REQUEST FOR SUSPENSION OF SPECIAL CONDITION

TO: The Honorable Katharine H. Parker
United States Magistrate Judge

On May 9, 2023, the above-named defendant appeared before Your Honor and was sentenced on the criminal offense of: Blackmail, in violation of 18 U.S.C. §§ 873 and 2, a Class A Misdemeanor. Mr. Trippitelli was sentenced to sixty (60) days imprisonment; one (1) year supervised release; pay a \$25.00 special assessment; and \$131,049.00 in restitution. The following special conditions were also imposed:

- 1) Defendant must perform 75 hours of community service at an organization that assists victims of domestic violence.
- 2) Defendant must notify the court of any material change in your economic circumstances that might affect your ability to pay restitution, fines, or special assessments.
- 3) Defendant must provide the probation officer with access to any requested financial information.
- 4) Defendant must not incur new card credit charges or open additional lines of credit without the approval of the probation officer unless you are in compliance with the restitution payment schedule.
- 5) Defendant must obey the immigration laws of the U.S. and comply with the directives of immigration authorities.
- 6) Defendant must have no contact with Victim or Victim's spouse. This includes any physical, visual, written, or telephonic contact with such persons. Additionally, you must not directly cause or encourage anyone else to have such contact with the Victim or the Victim's spouse.
- 7) The Court recommends you be supervised by the district of residence.

The Honorable Katharine H. Parker

Page 2

RE: TRIPPITELLI, Luca

- 8) Defendant shall notify within 30 days the Clerk of Court, the US Probation Office (during any period of supervised release) and the US Attorney's Office, 86 Chambers St., 3d Floor, NY, NY 10007 (Attn: Financial Litigation Unit) of any change of your name, residence, or mailing address or any material change in your financial resources that affects your ability to pay restitution. If you disclose, or the government otherwise learns of additional assets not known to it at this time, the government may seek a court order modifying the restitution payment schedule consistent with the discovery of new or additional assets.

On September 5, 2023, Mr. Trippitelli commenced his one (1) year term of supervised release in the Eastern District of Virginia. Since that time, he has maintained a stable residence; has secured gainful employment; not received any new criminal charges/convictions; and has paid toward restitution in a timely manner. His supervised release is scheduled to expire on or about September 4, 2024.

The Court is respectfully advised that this Probation Officer and Mr. Trippitelli have contacted several organizations in the greater Richmond area that serve victims of domestic violence inquiring about community service work opportunities. This Probation Officer has been advised by said organizations that they would require an individual to pass a criminal background check and complete a volunteer training program. When advised of Mr. Trippitelli's non-violent misdemeanor conviction, they have declined an opportunity for him to perform community service work for their respective organization by also noting that volunteer opportunities are not available. Therefore, this probation officer respectfully requests the Court to suspend the community service work special condition.

If you have any questions or concerns, please contact me at (804) 916-2543.

Approved: Katharine H Parker 05/21/2024
 The Honorable Katharine H. Parker Date
 United States Magistrate Judge

Disapproved: _____
 The Honorable Katharine H. Parker Date
 United States Magistrate Judge

Comments:

CEM/vdh